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*Attorneys for Specially Appearing Defendants MyHeritage Ltd. and MyHeritage (USA), Inc.*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY  
TRENTON VICINAGE**

ATLAS DATA PRIVACY CORP., JANE  
DOE-1, JANE DOE-2, EDWIN  
MALDONADO, SCOTT MALONEY,  
JUSTYNA MALONEY, PATRICK  
COLLIGAN, and WILLIAM SULLIVAN

*Plaintiffs,*

v.

MYHERITAGE LTD., MYHERITAGE  
(USA), INC., RICHARD ROES 1-10,  
*fictitious names of unknown individuals*, and  
ABC COMPANIES 1-10, *fictitious names of  
unknown entities*,

*Defendant.*

Civil Action No.

Application is hereby made pursuant to Local Civil Rule 6.1(b) for a Clerk's Order  
extending the time within which Specially Appearing Defendants MyHeritage Ltd. and

MyHeritage (USA), Inc. (collectively, “Defendants”) may answer, move, or otherwise reply to the Complaint. It is represented that:

1. Defendants have not previously obtained any extension of time to answer, reply, move, or otherwise response to the Complaint;
2. Defendant MyHeritage (USA), Inc. was served with the Complaint on February 29, 2024;
3. Defendants filed their Notice of Removal on March 29, 2024.
4. Without this extension, the time within which Defendant MyHeritage (USA), Inc. may answer, move, or otherwise reply to the Complaint would expire on April 5, 2024; and
5. With this extension, the time for Defendants to answer, move, or otherwise reply will be extended for a period of fourteen (14) days, until April 19, 2024.

Dated: March 29, 2024

Respectfully submitted,

Jacquelyn Fradette (*pro hac vice* to be filed)  
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By: /s/ Nicholas K. Lagemann  
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**CERTIFICATE OF SERVICE**

I, the undersigned, hereby certify that on this 29 day of March 2024, a true and correct copy of the foregoing **DEFENDANTS MYHERITAGE LTD. AND MYHERITAGE (USA), INC.’S APPLICATION FOR AN EXTENSION OF TIME TO ANSWER, REPLY, MOVE, OR OTHERWISE RESPOND TO PLAINTIFFS’ COMPLAINT UNDER LOCAL RULE 6.1(b)** was electronically filed and copies were served by ECF upon all counsel of record in this matter.

Date: March 29, 2024

/s/ Nicholas K. Lagemann  
Nicholas K. Lagemann

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY  
TRENTON VICINAGE**

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*fictitious names of unknown individuals*, and  
ABC COMPANIES 1-10, *fictitious names of  
unknown entities*,

*Defendant.*

Civil Action No.

The above L. Civ. R. 6.1(b) Application is ORDERED GRANTED and the time within  
the above-referenced Defendants may answer, reply, move, or otherwise respond to the  
Complaint filed by Plaintiffs is hereby extended to April 19, 2024.

ORDER DATED: \_\_\_\_\_

MELISSA E. RHOADS, Clerk

By: \_\_\_\_\_  
Deputy Clerk